

Virginia City Hybrid Energy Center
Response to Data Request
Vivian Thomson, Vice Chair, Virginia Air Pollution Control Board

Question (Page No. 5):

Cumulative impacts modeling for PM and SO₂ was not conducted.

Response:

For the Class I cumulative PSD increment analyses, the original inventories of background sources were provided by the individual states. In some instances allowable, permitted or potential-to-emit emissions were identified. If more than one emission rate was provided, the largest emission rate was conservatively used in the modeling. Many additional conservative features were built into the cumulative analysis. For example, if it was not known whether a particular source was a PSD source or a NAAQS source, it was assumed to be a PSD source. Also, if a facility was identified as PSD, but the specific units at that facility were not identified as PSD units, all the SO₂ emitting units in the facility were modeled as PSD emitting units.

In response to this issue a cumulative increment analysis for Class I areas was conducted. This analysis includes supplementary sources, primarily Electric Generating Units (EGUs) that have either increased or decreased emissions since the Minor Source Baseline Date was set in the Class I areas. These EGUs, which are often the largest emitters of sulfur dioxide, had reported data on 3-hour and 24-hour emission rates. These short term rates were used in the new cumulative analysis, which showed no exceedances of increment.